



November 18, 2011

Via Electronic Filing

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Notice of Oral *Ex Parte* Communications, WC Docket Nos. 11-42, 03-109; CC Docket No. 96-45

Dear Ms. Dortch:

On November 16, 2011, Benjamin Lennett, Policy Director at New America Foundation's Open Technology Initiative, Sarah Morris, Policy Analyst at New America Foundation's Open Technology Initiative, and Greta Byrum, Policy Analyst at New America Foundation's Open Technology Initiative ("NAF"), met with Lisa Hone, Wireline Advisor to Commissioner Copps to discuss the Commission's proposed Lifeline Broadband Pilot Program. This notice is submitted in compliance with Section 1.1206(b) of the Commission's Rules.

NAF reiterated that it is critical that the Commission include an evaluation metrics in its design of a broadband pilot. Proper evaluation ensures that the Commission has a mechanism with which to review the impact of any broadband adoption efforts through the pilot and to understand which components of the pilot were successful or not successful in increasing meaningful broadband adoption within low-income communities. NAF also noted that through their work on BTOP evaluation they have found that using only subscription rates in the evaluation of broadband adoption programs is too narrow a method to measure meaningful adoption and use.

To assist the Commission in its implementation of an evaluation process and in response to requests in both the Notice of Proposed Rulemaking and Further Inquiry for Lifeline and Link Up Reform and Modernization¹, NAF presented Ms. Hone with a document (submitted to the docket along with this notice of ex parte) that outlines existing federal means-tested programs

¹ In the Matter of Lifeline and Link Up Reform and Modernization, WC Docket Nos. 11-42, 03-109; CC Docket No. 96-45 at ¶ 279, *Notice of Proposed Rulemaking*, (rel. Mar. 4, 2011) ("NPRM"), noting that "[a] broadband pilot program could help us gather comprehensive and statistically significant data about the effectiveness of different approaches in making broadband more affordable for low-income Americans"; *Further Inquiry into Four Issues in the Universal Service Lifeline/Link Up Reform and Modernization Proceeding*, DA 11-1346, WC Docket Nos. 11-42, 03-109; CC Docket No. 96-45 at 1 (rel. Aug. 5, 2011) ("Further Inquiry"), seeking comment on "designing and implementing a Lifeline/Link Up broadband pilot program to evaluate whether and how Lifeline/Link Up can effectively support broadband adoption by low-income households."

and analyzes how those programs could instruct an evaluation of the broadband pilot program that is both robust and feasible. This document is a supplement to the previous study design that NAF submitted as an attachment to its comments with Benton Foundation and others.²

NAF also emphasized that the Commission must consider evaluation at the outset of designing the program, including a determination of specific evaluative metrics and criteria. Incorporating pilot evaluation early in the process allows for consistent measurement across all funded projects, and also allows the Commission to incorporate geographic and demographic diversity into the pool of potential broadband pilot participants.

Finally, in response to concerns raised by Ms. Hone about the potential for overburdening pilot participants with evaluative tools, NAF suggested ways in which the Commission could prioritize the data they are interested in collecting and use various tools, such as splash screens, focus groups, surveys, and intake/exist forms to collect a variety of information in minimally invasive ways. NAF also recommended the Commission make the data collected from the pilot projects openly available to the public to allow other researchers to analyze and evaluate the impact of the pilots.

Pursuant to the Commission's rules, this notice is being filed in the above-referenced dockets for inclusion in the public record.

Respectfully submitted,

/s/ Sarah J. Morris

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CC: Lisa Hone

² Comments of The Benton Foundation, The Open Technology Initiative at New America Foundation, Public Knowledge, United Church of Christ, OC Inc., The Center for Rural Strategies, Access Humboldt, and Deep Tech, WC Docket Nos. 11-42, 03-109; CC Docket No. 96-45, Appendix A (filed Aug. 24, 2011).